

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

IN RE:	)	Chapter 11
	)	
HEALTH DIAGNOSTIC LABORATORY,	)	Case No. 15-32919-KRH
INC., ET AL.,	)	
	)	Jointly Administered
Debtors.	)	

**MIDDLE SCHOOL RENAISSANCE 2020, LLC'S  
MOTION TO JOIN IN THE REPLY AND LIMITED OPPOSITION TO  
MOTION FOR ENTRY OF AMENDED ORDER APPROVING PROCEDURES  
GOVERNING AVOIDANCE ACTION ADVERSARY PROCEEDINGS FILED BY  
MAGGIE L. WALKER GOVERNOR'S SCHOOL FOR GOVERNMENT AND  
INTERNATIONAL STUDIES FOUNDATION, INC.**

COMES NOW Middle School Renaissance 2020, LLC ("MSR"), by the undersigned counsel, and hereby files this Motion to Join (the "Joinder") in the Maggie L. Walker Governor's School for Government and International Studies Foundation, Inc.'s ("Walker") Reply and Limited Opposition to Motion for Entry of Amended Order Approving Procedures Governing Avoidance Action Adversary Proceedings (the "Reply")(Docket No.2310). MSR hereby moves to adopt and join in the Reply on the grounds described below:

1. MSR is a nonprofit limited liability company that is a community-wide collaboration providing free, high-quality, out-of-school programs (after school and during the Summer) for Richmond Public Schools' young teenagers. On March 31, 2017, Richard A. Arrowsmith, as Liquidating Trustee for the HDL Liquidating Trust, filed an Adversary Proceeding against MSR designated as Adversary Proceeding No. 17-03103. Attached to the Summons served with that Complaint was an Order Establishing Procedures for Avoidance Action Adversary Proceedings entered herein on May 16, 2016 (Docket No. 1135), which outlines certain procedures relative to the proceeding brought against MSR.

2. MSR has sought, and has obtained, two (2) thirty-day extensions to file any response to the Complaint.

**JOINDER**

3. On May 15, 2017 Walker filed the Reply.

4. MSR joins in the Reply for the reasons stated therein. MSR and Walker are similarly situated in that each is a nonprofit organization which has been sued in adversary proceedings that have almost identical counts alleging similar facts and legal issues. The concerns and issues raised by Walker's Reply are shared by MSR. As such, MSR joins in the Reply *in toto*.

WHEREFORE, based upon the foregoing, MSR respectfully prays that the Court:  
(1) grant the relief requested by Walker in the Reply and (2) grant MSR such other and further review and is just and proper.

Respectfully submitted,

MIDDLE SCHOOL RENAISSANCE 2020,  
LLC

By: \s\ Paul S. Bliley, Jr  
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**Certificate of Service**

I hereby certify that on the 15<sup>th</sup> day of May, 2017, a true and correct copy of the foregoing Motion for Joinder was served on all parties receiving notice in this case through the ECF System.

\s\ Paul S. Bliley, Jr.  
Paul S. Bliley, Jr.